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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92071980
Party	Defendant GODISGHL, LLC
Correspondence Address	GODISGHL LLC 2315 EAST LARKWOOD STREET WEST COVINA, CA 91791 UNITED STATES no email provided no phone number provided
Submission	Answer
Filer's Name	Lloyd S. Mann
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Date	09/23/2019
Attachments	Answer to Petition.pdf(1943843 bytes)

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GODISGHL, LLC

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

ELEVATED FAITH, LLC,)	Cancellation No. 92071980
)	
Petitioner,)	Registration No. 5187052
)	
vs.)	Mark: G V V
)	
GODISGHL, LLC,)	
)	
Registrant.)	
_____)	

REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION

Registrant, GODISGHL, LLC, by and through its undersigned counsel, hereby respond to the Petition for Cancellation ("Petition") as follows:

The Parties

1. Registrant is without knowledge or information sufficient to form a belief as to paragraph 1 of the Petition and therefore denies the same.
2. Registrant admits the allegations in paragraph 2 of the Petition.
3. Registrant is without knowledge or information sufficient to form a belief as to paragraph 3 of the Petition and therefore denies the same.

THE MARK

4. Registrant admits the allegations in paragraph 4 of the Petition.
5. Registrant is without knowledge or information sufficient to form a belief as to paragraph 5 of the Petition and therefore denies the same.
6. Registrant admits the allegations in paragraph 6 that the registrant submitted T-shirt specimens with the Registered Mark, but has insufficient information to form a belief as to the remaining portions of paragraph 6 of the Petition and therefore denies the same.

COUNT 1: IMPROPER REGISTRATION AS A GENERIC UNIVERSAL

SYMBOL

7. Registrant denies the allegations in paragraph 7 of the Petition.
8. Registrant denies the allegations in paragraph 8 of the Petition.
9. Registrant denies the allegations in paragraph 9 of the Petition.

COUNT TWO: IMPROPER REGISTRATION BY NON-OWNER

10. The Registrant admits the allegations contained in paragraph 10 in so far as the dates alleged, but denies all other allegations contained in 10 of the Petition.
11. Registrant is without knowledge or information sufficient to form a belief as to paragraph 11 of the Petition and therefore denies the same.
12. The Registrant denies the allegations contained in paragraph 12 of the Petition.

COUNT THREE: IMPROPER REGISTRATION AS A DECEPTIVE MARK

13. Registrant is without knowledge or information sufficient to form a belief as to paragraph 13 of the Petition and therefore denies the same.

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14. The Registrant denies the allegations contained in paragraph 14 of the Petition.
15. The Registrant denies the allegations contained in paragraph 15 of the Petition.
16. The Registrant denies the allegations contained in paragraph 16 of the Petition.
17. The Registrant denies the allegations contained in paragraph 17 of the Petition.
18. The Registrant denies the allegations contained in paragraph 18 of the Petition.

COUNT FOUR: FRAUD

19. The Registrant denies the allegations contained in paragraph 19 of the Petition.
20. The Registrant denies the allegations contained in paragraph 20 of the Petition.
21. The Registrant denies the allegations contained in paragraph 21 of the Petition.
22. The Registrant denies the allegations contained in paragraph 22 of the Petition.
23. The Registrant denies the allegations contained in paragraph 23 of the Petition.
24. The Registrant denies the allegations contained in paragraph 24 of the Petition.
25. The Registrant denies the allegations contained in paragraph 25 of the Petition.
26. The Registrant denies the allegations contained in paragraph 26 of the Petition.
27. The Registrant denies the allegations contained in paragraph 27 of the Petition.

AFFIRMATIVE DEFENSES

1. The Petition fails to state facts sufficient to constitute any claim for relief against the Registrant.
2. The Petitioner has not and will not be damaged by the registration of the subject trademark, and therefore lacks standing to petition to cancel the registration.
3. The Petitioner assumed the risk of damage to itself. Petitioner has no right to the generic descriptive term at issue and any claim of damage to Petitioner is of its own

doing. Petitioner failed to accurately identify its interest in the generic descriptive term at issue prior to its adoption by the general public.

4. Petitioner is barred from seeking cancellation of the registrant's trademark pursuant to the doctrines of laches, estoppel, waiver and unclean hands.

5. Petitioner has acquiesced in registrant's adoption, registration and use of the mark that is the subject of the Petition.

WHEREFORE, Registrant prays that the Petition be dismissed with prejudice.

Respectfully submitted,

Dated: September 23, 2019



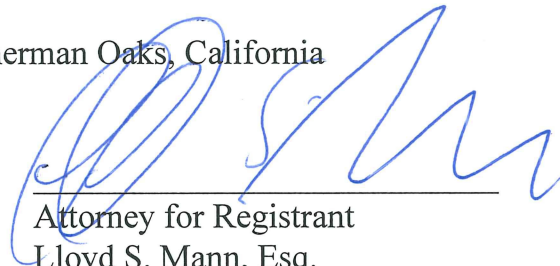
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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2019, a true and correct copy of the foregoing **REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION** has been served by mailing said copy on September 23, 2019, at Sherman Oaks, California, via first class mail, postage prepaid, addressed to Applicant, at the correspondence address of record with the USPTO:

KEVIN CHRISTOPHER
ROCKRIDGE VENTURE LAW
801 BROAD ST STE 428
CHATTANOOGA, TN 37402 UNITED STATES

Executed on September 23, 2019, at Sherman Oaks, California

A handwritten signature in blue ink, appearing to read "L. Mann", is written over a horizontal line.

Attorney for Registrant

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